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Lma
PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

Western DIVISION

Jane Doe)
_____)
_____))

(Enter above the full name
of the Plaintiff[s] in this
action).

Case No.

5:22-CV-00303-BO

(To be assigned
by the Clerk of
District Court)

vs.

Duke University)
_____)
_____))

(Enter above the full name of
ALL Defendant[s] in this action.
Fed.R.Civ.P.10(a) requires that
the caption of the complaint
include the names of **all** the
parties. Merely listing one
party and "et al." is insufficient.
Please attach additional sheets if
necessary).

COMPLAINT

1. Plaintiff resides at 4000 Dominion Ridge
Circle, Morrisville, NC, 27560

2. Defendant(s) name(s): Duke University

Location of principal office(s) of the named defendant(s):

2301 Erwin Rd, Durham, NC, 27705

Nature of defendant(s) business:

Higher Education,
Research, Medical Facility

Approximate number of individuals employed by defendant:

43,000+

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on this court by 42 U.S.C. § 2000e-5. Equitable and other relief are also sought under 42 U.S.C. § 20003-5(g).

4. The acts complained of in this suit concern:

- (A) _____ Failure to employ me.
- (B) _____ Termination of my employment.
- (C) ☒ _____ Failure to promote me.
- (D) _____ Other acts as specified below:

5. Plaintiff is:

(A) ☐ presently employed by the defendant.

(B) ☒ not presently employed by the defendant.

The dates of employment were 7/1/2019 - 10/16/2021.

Employment was terminated because:

(1) ☐ plaintiff was discharged.

(2) ☐ plaintiff was laid off.

(3) ☒ plaintiff left job voluntarily.

6. Defendant(s) conduct is discriminatory with respect to the following:

(A) ☒ my race.

(B) ☐ my religion.

(C) ☐ my sex.

(D) ☐ my national origin.

(E) ☐ other as specified below:

7. The name(s), race, sex, and the position or title of the individual(s) who allegedly discriminated against me during the period of my employment with the defendant company is (are):

Valerie Abbott, White, Female, Research
Administration Manager

Michelle Bigsbee, White, Female, Vice Provost
of Research Administration

8. The alleged discrimination occurred on or about October 2020 - November 2021

9. The nature of my complaint, i.e., the manner in which the individuals(s) named above discriminated against me in terms of the conditions of my employment is as follows:

In December of 2020, Ms. Doe informed her manager, Valerie Abbott that the advantageous work environment created for her white counterpart was discriminatory. Despite many requests, Ms. Doe was not provided with essential tools for her job duties and witnessed her white co-workers receive these basic necessities. Ms. Doe escalated the issue to Ms. Abbott's manager Michelle Riggsbee and members of Human Resources. Ms. Abbott and Ms. Riggsbee began retaliating against Ms. Doe by asking her to resign as the Chair of the Employee Diversity and Inclusion Committee. In September of 2021, Ms. Abbott forcibly removed Ms. Doe from the Committee. In May of 2021, Ms. Doe received mental health treatment and was medically diagnosed as mentally incapacitated due to work-induced stress in September of 2021.

10. The alleged illegal activity took place at: Duke University

11. I filed charges with the Equal Employment Opportunity Commission regarding defendant(s) alleged discriminatory conduct on or about August 2021. I have attached a copy of the Notice of Right to Sue letter issued by the Equal Employment Opportunity Commission. This letter was received by me on _____

12. I seek the following relief:

(A) _____ recovery of back pay;

(B) _____ reinstatement to my former job;

(C) ☒ trial by jury on all issues so triable;

and any other relief as may be appropriate, including
injunctive orders, damages, costs and attorney's fees.

8/5/2022
Date

Lane Doe

Signature of Plaintiff

4000 Dominion Bridge Circle, Apt.
4324, Morrisville, NC 27560

757. 297. 2050

Address and Phone Number of Plaintiff